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June 4, 2008

Via Facsimile – (212) 805-6382

Honorable Victor Marrero
United States District Judge
United States Courthouse, Suite 600
500 Pearl Street
New York, New York 10007

USDS SDNY
DOCUMENT
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Re: Sylvania Collins v. National Railroad Passenger Corporation
07-CV-7023 (VM)

Dear Judge Marrero:

We represent defendant National Railroad Passenger Corporation d/b/a Amtrak, and write to respectfully request a thirty day extension of the June 9, 2008 fact discovery deadline to July 9, 2008. This is the first request for an extension of the fact discovery deadline in this case. Plaintiff's counsel consents to this request.

The reason for this request is that defendant only recently received plaintiff's medical records from non-party medical providers. Plaintiff's deposition has been scheduled for June 10, 2008 and the parties expect to complete defendant's deposition within the next thirty days. Accordingly, we respectfully request that the following schedule be adopted:

- Fact discovery due by July 9, 2008
- Requests to admit to be served by July 31, 2008
- Expert discovery to be completed by plaintiff by July 31, 2008
- Expert discovery to be completed by defendant by September 2, 2008

We also respectfully request that the Court adjourn the June 13, 2008 status conference to another date convenient to the Court beyond the proposed July 9, 2008 fact discovery deadline. Please be advised that all counsel are available during the week of July 14, 2008.

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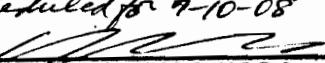
We thank you for your consideration and await your decision. If you should have any questions, please do not hesitate to contact us.

Respectfully,



Ameet B. Kabrawala

cc: Via Facsimile – (212) 594-0019
Robert T. Parrinelli, Esq.

Request GRANTED. The Case Management Plan for this action is amended so as to extend the time for completion of fact discovery to 7-9-08. Any other related deadline affected by this extension shall be similarly modified. as set forth SO ORDERED. above. The next status conference is scheduled for 7-10-08 at 11:45 a.m. 

DATE 6-10-08 VICTOR MARRERO, U.S.D.J.